

1 **DECLARATION OF COTEY CSWAYKUS**

2 I, Cotey Cswaykus, declare as follows:

3 1. I am currently employed by Chevron U.S.A. Inc., a Pennsylvania corporation
4 ("Chevron U.S.A."), as a Refinery Business Manager. From approximately February 2019 to
5 October 2020, I was employed as a Routine Maintenance Manager in El Segundo, California. I
6 have personal knowledge of the facts set forth in this declaration, which are known by me to be true
7 and correct. If called as a witness, I could and would competently testify concerning these facts
8 under oath.

9 2. In or about Fall of 2019, I was the job owner for an open El Segundo Routine
10 Maintenance General Team Lead position. Plaintiff Mark Snookal was one of the candidates for
11 that position whom I interviewed.

12 3. I did not consider any candidate's age or apparent age in making my selection for
13 this position. I understand it is illegal to make a hiring decision based on a candidate's age, and
14 believe it would be unfair to do so. I did not know the ages of any of the candidates who applied
15 for this position, including Mr. Snookal.

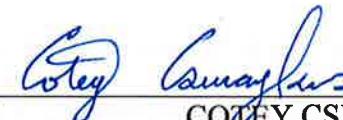
16 4. After interviewing the candidates for the El Segundo Routine Maintenance General
17 Team Lead position, I rated each of them numerically in various categories as part of the regular
18 candidate selection process. The employee who was ultimately selected for the position received
19 higher ratings than Mr. Snookal in the criteria of Functional Experience and in Leadership
20 Behaviors. At that time, I was already supervising that employee and had a good understanding of
21 his functional experience and leadership skills and believed he was a better fit than Mr. Snookal for
22 the role.

23 5. I am familiar with Chevron U.S.A.'s policies regarding Equal Opportunity
24 Employment, which were provided to me during my employment with Chevron U.S.A. As a
25 supervisor, I regularly receive training in Chevron U.S.A.'s policies regarding Equal Opportunity
26 Employment and prohibition against discrimination, harassment, and retaliation.

27

28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct and that this declaration was executed on 08/21/2024 at El Segundo,
3 California.

4 
5 COTEY CSWAYKUS

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28